

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|  |   |                                |
|--|---|--------------------------------|
| UNITED STATES OF AMERICA, <i>ex rel.</i> | ) |                                |
| DEBORAH RADKE, as Relator under          | ) |                                |
| THE FALSE CLAIMS ACT,                    | ) |                                |
|  | ) | Case No. 12-cv-06238           |
| <i>Plaintiff,</i>                        | ) | Judge Sharon Johnson Coleman   |
| v.                                       | ) | Magistrate Judge: Susan E. Cox |
|  | ) |                                |
| SINHA CLINIC CORP.; BABER AND            | ) |                                |
| ASSOCIATES, LLC; SHOBA SINHA, M.D.;      | ) |                                |
| SABRINA YOUNG, PH.D., PSY.D.             | ) |                                |
|  | ) |                                |
| <i>Defendants.</i>                       | ) |                                |

**DEFENDANT YOUNG’S MOTION TO DISMISS**

NOW COMES Defendant, SABRINA YOUNG (“Young”), through her counsel, Robert Costello, and for her motion to dismiss pursuant to FRCP 9(b) and 12(b)(6), states as follows:

1. Defendant Young adopts and incorporates herein, as her statements of fact and arguments in support of this motion, all statements of fact and arguments submitted by Defendants Sinha Clinic and Shobha Sinha, M.D. in their joint motion to dismiss filed in this matter on February 20, 2015, as Documents # 31 and 33.

2. Defendant Young adds that Plaintiff does not allege any acts of fraud against Defendant Young with sufficient particularity to satisfy the pleading requirements of FRCP 9(b).

WHEREFORE, Defendant Young prays that the Court enter an order dismissing the Complaint and awarding Defendant Young her attorney’s fees and costs in defending this action.

Respectfully Submitted,  
SABRINA YOUNG

By: s/ Robert Costello  
Her Counsel

Robert Costello  
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